From:	Sankula, Sujatha
To:	Khan, Faruque
Cc:	Odenkirchen, Edward; Radtke, Meghan
Subject:	FW: GF-2726 (EPA No. 62719-AUO) Nozzle Characterization Study Plan
Date:	Friday, January 31, 2014 9:01:19 AM
Attachments:	image003.png DRAFT GF-2726 Wind Tunnel Droplet Size Characterization Study Plan.docx

Attachment is part of MRID 49384801

Let us get this reviewed by next Tuesday. Thanks Faruque.

Meghan

Please add to the TS.

From: Cowles, James
Sent: Friday, January 31, 2014 7:51 AM
To: Sankula, Sujatha
Cc: Kenny, Daniel
Subject: FW: GF-2726 (EPA No. 62719-AUO) Nozzle Characterization Study Plan

Sujatha-

See email below and document attached for Dow's proposal to assess other nozzles for 2,4-D choline. Please have the team review the proposal and work with RD to provide feedback by February 7 if possible.

Thanks

Jim

From: Fonseca, Diego (D) [mailto:dfonseca@dow.com]
Sent: Thursday, January 30, 2014 4:22 PM
To: Cowles, James
Cc: Kenny, Daniel; Krieger, Mark (M)
Subject: GF-2726 (EPA No. 62719-AUO) Nozzle Characterization Study Plan

Dear Jim.

Based on the EPA EFED-DAS discussion on January 16th, DAS has developed a study plan to characterize a number of commercially-available spray nozzles relative to the specific nozzle used in a field drift characterization study with the DAS formulation GF-2726 (TeeJet AIXR 11004). Characterization of these nozzles under a single set of identical conditions will allow identification of nozzles that have equivalent or better characteristics to the nozzle used in the field study. Given that these nozzles would exhibit lower amounts of drift, they could be added to those approved for use with GF-2726 and the setback distance that has been determined using the AIXR 11004 nozzle.

Specifically, the objective of the study is to measure the drop-size distribution produced with GF-2726 in a low speed wind tunnel with a variety of spray nozzle tips. The design of the experiments will be based upon the EPA Draft

Verification Protocol for Pesticide Spray DRT (September 2013 Draft; received from EPA on January 16th, 2014), as requested by EPA in the discussion. Results, expressed as volume percent fine particles (defined as % fines < 100 um and/or < 141 um), will be compared to the results produced with a TeeJet Air Induction Extended Range (AIXR) model 11004 nozzle.

DAS would appreciate confirmation from EPA that proposed study plan (attached) is consistent with agreement reached last January 16th. We would be grateful if EPA could provide a response no later than Friday, February 7th, in order to initiate the nozzle characterization study.

Diego Fonseca Regulatory Manager
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